



Via ECF only

May 27, 2020

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 1305
New York, New York 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: Roc Nation LLC v. HCC International Insurance Company, PLC
Venue: US District Court - Southern District of New York
Case No.: 1:19-cv-00554-PAE

Dear Judge Engelmayer:

This firm is legal counsel to Houston Casualty Company (“HCC”), improperly pled as HCC International Insurance Company, PLC, regarding the above-referenced matter. We write to request permission, pursuant to § 4.B of Your Honor’s individual rules and practices, to file the following document under seal in its totality: (1) HCC’s letter motion seeking to file discovery motion pursuant to Rule 2(C) of your Individual Rules and Practices in Civil Cases; (2) HCC’s letter regarding discovery issues and seeking to meet and confer (Exhibit A); (3) HCC’s second letter regarding discovery issues and seeking to meet and confer (Exhibit B); (4) the responses of respective counsel for Roc Nation, Atty. Kupinse and Hal Blackman (Exhibit C); (5) Roc Nation’s request for the destruction of documents produced by Hal Blackman (Exhibit D); (6) portions of the transcript of the deposition of Hal Blackman (Exhibit E); and (7) portions of the transcript of the deposition of Desiree Perez (Exhibit F). In accordance with Your Honor’s instructions, the documents have been uploaded via ECF with a limited viewing level restricting viewing to selected parties as we await Your Honor’s review of these documents and decision.

Defendant seeks to file the aforementioned documents under seal as they contain sensitive and confidential information pertaining to Plaintiff’s business operations, financial information, and proprietary information as well as like information pertaining to individuals and entities that are not parties to this litigation. This information is not available within the public domain and was contemplated by the parties when they jointly drafted and entered into the confidentiality order entered by Your Honor on August 6, 2019. *See* Document No. 42.

Good cause exists for granting this request to file the above-referenced documents under seal so that it may include these documents in HCC’s letter-motion seeking leave to file a motion to compel discovery.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/George J. Vogrin
George J. Vogrin

Denied. HCC's blanket proposal to file all documents under seal is blatantly improper. HCC is to file its letter publicly, with limited and narrowly tailored actions permitted to the publicly filed version. It is to do so by June 2, 2020. As to the exhibits, HCC is also instructed to file proposed redactions or a letter highlighting more tailored reasons why each particular exhibit warrants under-seal filing also by June 2, 2020. HCC is admonished that, if the Court determines that HCC has over-redacted materials without careful attention to the need for redactions to be as limited as possible, the Court may (1) direct that the entirety of HCC's submission will be publicly filed and/or (2) summarily deny HCC's discovery motion.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

May 29, 2020